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March 13, 2019

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VIA ECF

Honorable Paul E. Davidson
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: Russell v. Westchester Community College, et al.
Civil Action No. 16-cv-1712 (KMK) (PED)
Our File No. 20927.002**

Dear Magistrate Davidson:

We are substituted counsel for Plaintiff, Dr. Suzan Russell ("Plaintiff" or "Dr. Russell") in the above-referenced case. I am writing to request, upon consent of defense counsel, a revision of the Case Management and Scheduling Order, pursuant to the March 6, 2019 Order [Docket No. 82], as it relates to discovery. We have yet to have a substantive discussion with the client due to her illness. As such, as per the March 6, 2019 Order, a "meet and confer" was held between counsel for the parties and, upon the consent of defense counsel, respectfully propose the following revised discovery schedule:

- (1) Responses to all discovery ordered to be produced at the January 8, 2019 discovery conference; all outstanding signed HIPAA requests to be produced; all outstanding responses to discovery requests for production at Plaintiff's first deposition session and Defendants' depositions to be completed by April 15, 2019;
- (2) Plaintiff's continued deposition to be held by May 7, 2019;
- (3) Plaintiff's expert disclosures, including report(s), production of underlying documents to be served by May 30, 2019;
- (4) Defendants' expert disclosures, including report(s), production of underlying documents to be served by June 21, 2019;
- (5) Depositions of expert witnesses to be held by July 19, 2019;

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Lastly, we respectfully request, on consent, that the deadline for the conclusion of all discovery be extended to July 19, 2019.

Respectfully submitted,

s/Marshall Bellovin

Marshall B. Bellovin (MB 5508)

cc: Irma Cosgriff, Esq. (via ECF)
Danielle K. Conn Rosenberg, Esq. (via ECF)